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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
LAS VEGAS DIVISION**

RHONDA R. HESS,

Plaintiff

v.

NANCY A. BERRYHILL, Acting  
Commissioner of Social Security,

Defendant.

) Case No: 2:18-cv-02431-JAD-CWH  
)  
)  
)

**STIPULATION FOR EXTENSION OF  
TIME TO FILE DEFENDANT'S CROSS  
MOTION TO AFFIRM**

**(First Request)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of thirty days to Friday, June 14, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, including ten district court merits briefs due in the next month, as well as two Ninth Circuit cases at the responsive briefs stage.

1 On May 15, 2019, Plaintiff's counsel informed Defendant by email that he had no  
2 objection to this extension.

3  
4 Respectfully submitted,

5 Date: May 15, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/\*Cyrus Safa

7 CYRUS SAFA

8 \*authorized by email May 15, 2019

9 Attorney for Plaintiff

10 Date: May 15, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

Attorneys for Defendant

15 Of Counsel

16 Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

19  
20 IT IS SO ORDERED.

21  
22 DATE: May 21, 2019

23   
HONORABLE CARL W. HOFFMAN  
24 United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa  
Law Offices of Lawrence D. Rohlfing  
12631 E. Imperial Highway, Suite C-115  
Santa Fe Springs, CA 90670

Date: May 15, 2019

NICHOLAS A. TRUTANICH  
United States Attorney

By: /s/ Michael K. Marriott  
MICHAEL K. MARRIOTT  
Assistant Regional Counsel

Attorneys for Defendant